

March 2, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **NOTICE OF *EX PARTE* MEETINGS**
ET Docket No. 04-186

Unlicensed Operation in the TV Broadcast Bands

Dear Ms. Dortch:

On March 1, 2005, representatives of Shure Incorporated (“Shure”) held a series of *ex parte* meetings in the above-captioned docket to discuss issues raised in the pending Notice of Proposed Rulemaking (“Notice”). Attending from Shure were Jeff Krull, Vice President Engineering; Ahren Hartman, Principal Engineer, Advanced Development; and Edgar Reihl, P.E., Principal Engineer, Advanced Development. In addition, Catherine Wang and Jeanne Stockman of Swidler Berlin LLP, outside counsel to Shure, attended the meetings. Shure met with Sam Feder of Commissioner Martin’s office, Barry Ohlson of Commissioner Adelstein’s office, Commissioner Abernathy and John Branscome of her office, Sheryl Wilkerson of Chairman Powell’s office, and Bruce Franca, Alan Stilwell, and Hugh Van Tuyl, all of the Commission’s Office of Engineering and Technology (“OET”).

During these meetings, we discussed how the introduction of unlicensed devices in the TV bands, under the current proposal and assumptions set forth in the Notice, will likely cause harmful interference to wireless microphones and similar audio products. Such interference could adversely affect the many important productions and activities that rely on high-quality wireless audio products, including for example, news coverage, sporting events, and TV and music productions.

We discussed how the comments and reply comments filed in this proceeding show widespread concern among diverse industry segments that unlicensed devices will cause harmful

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interference to licensed operations if allowed to operate as proposed in the Notice. Broadcasters, various equipment manufacturers and their trade associations, engineering organizations, including IEEE and SBE, 700 MHz licensees, and a variety of wireless microphone interests are on the record offering data and analyses demonstrating that the proposal in the Notice does not sufficiently address the potential for harmful interference from unlicensed devices.

We also discussed protective measures that Shure has proposed in the event that the Commission nonetheless decides to permit unlicensed devices in the TV bands. A summary of these measures, attached, was provided to OET. We also discussed the fact that Personal/Portable unlicensed devices raise many unresolved interference issues, that industry groups have not yet sufficiently studied this use model, and that little, if any, consensus on how to address such interference has been achieved. Accordingly, we discussed a phased implementation of unlicensed devices to further mitigate interference.

If you have any questions regarding these meetings, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Catherine Wang
Jeanne W. Stockman

cc (by email): Meeting Participants